

60130-1923  
02MRA0228**REMARKS**

Claims 10-11 and 17-18 stand rejected under 25 USC 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which Applicant regards as the invention. Claim 10 has been amended to recite that the securing feature and the plurality of mounting interfaces are formed in one-piece. Claim 17 has been amended to delete the second occurrence of "reinforcement member."

Claims 1-3, 5-7 and 17 stand rejected under 35 USC 102(b) as being anticipated by Inami (U.S. Patent No. 4,090,734). Inami does not disclose a reinforcement member that is mountable to a mounting plate in a plurality of positions. Inami discloses a reinforcement member 10 that includes a central piece 14 and end pieces 16 and 18 that are welded or bonded to an inner panel of an automobile door (column 1, lines 40 to 55). The reinforcement member 10 is only mountable in one position. Inami does not disclose that the reinforcement member 10 is mountable in a plurality of positions as claimed. The claimed invention is not anticipated, and Applicant respectfully requests that the rejection be withdrawn.

Claims 1-2, 5-14 and 17-18 stand rejected under 35 USC 102(b) as being anticipated by Holt (U.S. Patent No. 5,417,470). Holt does not disclose a reinforcement member that is mountable to a mounting plate in a plurality of positions. Holt discloses a tube 30 that is attached to a latch mounting member 24 and a hinge 26. Tubes 32 and 34 are attached to the latch mounting member 24 and to a hinge 28 (column 5, lines 35 to 50 and Figure 1). Each tube 30, 32 and 34 is fixed in a single position to the latch mounting member 24 and the hinge components 26 and 28 and is not mountable in a plurality of positions as claimed. The claimed invention is not anticipated, and Applicant requests that the rejection be withdrawn.

Claims 3-4 and 15-16 stand rejected under 35 USC 103(a) as being obvious over Holt in view of Kowalski (U.S. Patent No. 5,868,456). The Examiner states that Kowalski teaches an interface that is shaped to match the shape of a reinforcement member, and it would be obvious to provide Holt with a channel for mounting the reinforcement members 30, 32 and 34. Applicant respectfully disagrees.

The claimed invention is not obvious. Holt teaches that the end of the tubes 30, 32 and 34 are flattened and are then welded to flattened arms 58, 60 and 62 of plates 64 and 66, as shown in Figure 1. Holt discloses that the ends of the tubes 30, 32 and 34 are flattened to provide the necessary deflection required for the correct performance of the structural module, to assist with

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the performance of the tubes 30, 32 and 34 (column 5, lines 57 to 63) and to weaken the ends of the tubes 30, 32 and 34. This is a disclosed benefit of Holt. If the arms 58, 60 and 62 of the plates 64 and 66 were modified to define channels as suggested by the Examiner, the ends of the tubes 30, 32 and 34 could not be flattened, but would rather be shaped to match the shape of the the arms 58, 60 and 62. This would ruin the disclosed benefit of Holt. Therefore, there is no suggestion to modify the arms 58, 60 and 62 of the plates 64 and 66 of Holt to be shaped as channels as claimed.

Additionally, it would not be possible to form the arms 58, 60 and 62 of Holt as channels. In Holt, the ends of the tubes 30, 32 and 34 are attached to a hinge 26 and to a latch mounting member 24, which each have a limited width in a direction transverse to a longitudinal direction of the vehicle. If the arms 58, 60 and 62 of Holt were shaped as channels because of Kowalski, the hinge 26 and the latch mounting member 24 of Holt would have to be significantly modified to receive the arms 58, 60 and 62, increasing the width of these components. This would affect the design of the hinge 26 and the latch mounting member 24 of Holt. The claimed invention is not obvious, and Applicant requests that the rejection be withdrawn.

Thus, claims 1-20 are in condition for allowance. The Commissioner is authorized to charge Deposit Account No. 50-1482, in the name of Carlson, Gaskey & Olds, P.C., \$450.00 for a two-month extension of time. No additional fees are seen to be required. If any additional fees are due, however, the Commissioner is authorized to charge Deposit Account No. 50-1482, in the name of Carlson, Gaskey & Olds, P.C., for any additional fees or credit the account for any overpayment. Therefore, favorable reconsideration and allowance of this application is respectfully requested.

Respectfully Submitted,

CARLSON, GASKEY & OLDS, P.C.



Karin H. Butchko

Registration No. 45,864

400 West Maple Road, Suite 350

Birmingham, Michigan 48009

Telephone: (248) 988-8360

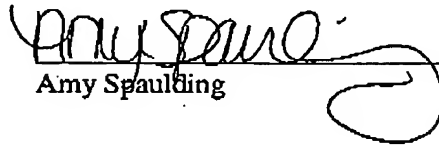
Facsimile: (248) 988-8363

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**CERTIFICATE OF FACSIMILE**

I hereby certify that this correspondence is being facsimile transmitted to the United States Patent and Trademark Office, (703) 872-9306 on February 1, 2005.

  
Amy Spaulding